

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Ref No. __

**ORDER SUSTAINING FTX RECOVERY TRUST’S ONE HUNDRED SIXTY-SECOND
(NON-SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN
SUPERSEDED CLAIMS (CUSTOMER CLAIMS)**

Upon the one hundred sixty-second omnibus objection (the “Objection”)² of the FTX Recovery Trust³, for entry of an order (this “Order”) sustaining the Objection and disallowing and expunging in their entirety the Superseded Claims set forth in Schedule 1 attached hereto; and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

³ The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ (as defined below) confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

this Court having found that proper and adequate notice of the Objection and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the FTX Recovery Trust; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each Superseded Claim set forth in Schedule 1 attached hereto is disallowed and expunged in its entirety. The claims listed in the column titled “Surviving Claims” identified on Schedule 1 attached hereto shall remain on the claims register, subject to (a) the FTX Recovery Trust’s further objections on any substantive or non-substantive grounds and (b) any order with respect to any prior or subsequent objection to the “Surviving Claims” identified on Schedule 1 attached hereto.
3. Should one or more of the grounds of objection stated in the Objection be dismissed, the FTX Recovery Trust’s right to object on any other grounds that the FTX Recovery Trust discovers is preserved.

4. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any Superseded Claims referenced or identified in the Objection that is not listed on Schedule 1 attached hereto.

5. To the extent a response is filed regarding any Superseded Claim, each such Superseded Claim, and the Objection as it pertains to such Superseded Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Superseded Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

6. The FTX Recovery Trust is authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the FTX Recovery Trust may have to enforce rights of setoff against the claimants.

8. Nothing in the Objection or this Order, nor any actions or payments made by the FTX Recovery Trust pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors or the FTX Recovery Trust

under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the FTX Recovery Trust's or any other party-in-interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the FTX Recovery Trust; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

10. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: _____
Wilmington, Delaware

The Honorable Karen B. Owens
Chief United States Bankruptcy Judge

SCHEDULE 1

Superseded Claims

FTX Trading Ltd. 22-11068 (KBO)
One Hundred Sixty-Second Omnibus Claims Objection
Schedule 1 - Superseded Claims

Claim Number	Claims to be Disallowed				Claim Number	Surviving Claims			
	Name	Debtor	Tickers	Ticker Quantity		Name	Debtor	Tickers	Ticker Quantity
58530	Name on file	FTX Trading Ltd.	DOGE ETH ETHW USD	53,194.796850220000000 13.000804160000000 0.000000005115970 0.000017500287109	58703*	Name on file	FTX Trading Ltd.	DOGE ETH ETHW ETHW GRT LTC SHIB TRX USD	53,194.796850220000000 13.028041600000000 0.000000005115970 0.000000005115970 0.0000017500287109 0.0000000007133406 700.208135009131300
58638	Name on file	FTX Trading Ltd.	DOGE ETH ETHW USD	53,194.796850220000000 13.000804160000000 0.000000005115970 0.000017500287109	58703*	Name on file	FTX Trading Ltd.	DOGE ETH ETHW ETHW GRT LTC SHIB TRX USD	53,194.796850220000000 13.028041600000000 0.000000005115970 0.000000005115970 0.0000017500287109 0.0000000007133406 700.208135009131300
10042	Name on file	FTX Trading Ltd.	DOGE ETH ETHW USD	53,194.796850220000000 13.000804160000000 0.000000005115970 0.000017500287109	58703*	Name on file	FTX Trading Ltd.	DOGE ETH ETHW ETHW GRT LTC SHIB TRX USD	53,194.796850220000000 13.028041600000000 0.000000005115970 0.000000005115970 0.0000017500287109 0.0000000007133406 700.208135009131300
845	Name on file	FTX Trading Ltd.	DOGE ETH ETHW USD	53,194.796850220000000 13.000804160000000 0.000000005115970 0.000017500287109	58703*	Name on file	FTX Trading Ltd.	DOGE ETH ETHW ETHW GRT LTC SHIB TRX USD	53,194.796850220000000 13.028041600000000 0.000000005115970 0.000000005115970 0.0000017500287109 0.0000000007133406 700.208135009131300
9336	Name on file	FTX Trading Ltd.	DOGE ETH ETHW USD	53,194.796850220000000 13.000804160000000 0.000000005115970 0.000017500287109	58703*	Name on file	FTX Trading Ltd.	DOGE ETH ETHW ETHW GRT LTC SHIB TRX USD	53,194.796850220000000 13.028041600000000 0.000000005115970 0.000000005115970 0.0000017500287109 0.0000000007133406 700.208135009131300
3583	Name on file	FTX Trading Ltd.	DOGE ETH ETHW USD	53,194.796850220000000 13.000804160000000 0.000000005115970 0.000017500287109	58703*	Name on file	FTX Trading Ltd.	DOGE ETH ETHW ETHW GRT LTC SHIB TRX USD	53,194.796850220000000 13.028041600000000 0.000000005115970 0.000000005115970 0.0000017500287109 0.0000000007133406 700.208135009131300
1320	Name on file	FTX Trading Ltd.	DOGE ETH ETHW USD	53,194.796850220000000 13.000804160000000 0.000000005115970 0.000017500287109	58703*	Name on file	FTX Trading Ltd.	DOGE ETH ETHW ETHW GRT LTC SHIB TRX USD	53,194.796850220000000 13.028041600000000 0.000000005115970 0.000000005115970 0.0000017500287109 0.0000000007133406 700.208135009131300
2823	Name on file	Quoine Pte Ltd	ATOM BCH CEL DASH ETH GALA QASH SNX UNI XRP	76.750000000000000 4.047393770000000 2.068.8450000000000 10.193944200000000 0.000566000000000 1.623.0000000000000 6.329.8272940000000 13.805774100000000 5.136308190000000 126.6545060000000	39686	Name on file	Quoine Pte Ltd	ATOM BCH BCH BTC 	

18302 Claim is also included in the FTX Recovery Trusts One Hundred Fifty-Five (Non-Substantive) Omnibus Objection to Certain Incorrect Debtor Proofs of Claim (Customer Claims). Claim is also included in the FTX Recovery Trusts One Hundred Fifty-Five (Non-Substantive) Omnibus Objection to Certain Incorrect Debtor Proofs of Claim (Customer Claims).

94777 Claim is also included in the FTX Recovery Trusts One Hundred Fifty-Five (Non-Substantive) Omnibus Objection to Certain Incorrect Debtor Proofs of Claim (Customer Claims).

94778 Claim is also included in the FTX Recovery Trusts One Hundred Fifty-Five (Non-Substantive) Omnibus Objection to Certain Incorrect Debtor Proofs of Claim (Customer Claims).

81562 Claim is also included in the FTX Recovery Trusts One Hundred Seventy-Five (Non-Substantive) Omnibus Objection to Certain Incorrect Debtor Proofs of Claim (Customer Claims).

81563 Claim is also included in the FTX Recovery Trusts One Hundred Fifty-Five (Non-Substantive) Omnibus Objection to Certain Incorrect Debtor Proofs of Claim (Customer Claims).

13430 Claim is also included in the FTX Recovery Trusts One Hundred Fifty-Five (Non-Substantive) Omnibus Objection to Certain Incorrect Debtor Proofs of Claim (Customer Claims).

13431 Claim is also included in the FTX Recovery Trusts One Hundred Fifty-Five (Non-Substantive) Omnibus Objection to Certain Incorrect Debtor Proofs of Claim (Customer Claims).

Underpinners: Indices claim contains relevantly and/or underpinned amounts

Claims to be Disallowed					Surviving Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity	Claim Number	Name	Debtor	Tickers	Ticker Quantity
		BAND-PERP		0.0000000000000000		BAND-PERP			0.0000000000000000
		BCH-PERP		0.0000000000000000		BCH-PERP			0.0000000000000000
		BNB-20210326		0.0000000000000000		BNB-20210326			0.0000000000000000
		BNB-20210625		0.0000000000000000		BNB-20210625			0.0000000000000000
		BNB-PERP		0.0000000000000000		BNB-PERP			0.0000000000000000
		BNT-PERP		0.0000000000000000		BNT-PERP			0.0000000000000000
		BSV-PERP		0.0000000000000000		BSV-PERP			0.0000000000000000
		BTC		0.000000001607517		BTC			0.000000001607517
		BTC-20201225		0.0000000000000000		BTC-20201225			0.0000000000000000
		BTC-20210326		0.0000000000000000		BTC-20210326			0.0000000000000000
		BTC-20210625		0.0000000000000000		BTC-20210625			0.0000000000000000
		BTC-20210924		0.0000000000000000		BTC-20210924			0.0000000000000000
		BTC-20211231		0.0000000000000000		BTC-20211231			0.0000000000000000
		BTC-HASH-202024		0.0000000000000000		BTC-HASH-202024			0.0000000000000000
		BTC-HASH-2021Q1		-0.0000000000000007		BTC-HASH-2021Q1			-0.0000000000000007
		BTC-PERP		0.0000000000000017		BTC-PERP			0.0000000000000017
		BULL		0.0000000003181170		BULL			0.0000000003181170
		CARLESEN2021		0.0000000000000000		CARLESEN2021			0.0000000000000000
		COMP-20210326		0.0000000000000001		COMP-20210326			-0.0000000000000001
		COMP-PERP		-0.0000000000000046		COMP-PERP			-0.0000000000000046
		CREAM-20210326		0.0000000000000000		CREAM-20210326			0.0000000000000000
		CREAM-PERP		0.0000000000000006		CREAM-PERP			0.0000000000000006
		CNU-PERP		0.0000000000000000		CNU-PERP			0.0000000000000000
		DAI		0.000000005537820		DAI			0.000000005537820
		DEFI-20211225		0.0000000000000000		DEFI-20211225			0.0000000000000000
		DEFI-20210326		0.0000000000000000		DEFI-20210326			0.0000000000000000
		DEFI-20210625		0.0000000000000000		DEFI-20210625			0.0000000000000000
		DEFI-PERP		0.0000000000000000		DEFI-PERP			0.0000000000000000
		DEMISENATE		0.0000000000000018		DEMISENATE			0.0000000000000018
		DOGE-20201225		0.0000000000000000		DOGE-20201225			0.0000000000000000
		DOGE-20210326		0.0000000000000000		DOGE-20210326			0.0000000000000000
		DOGE-PERP		0.0000000000000000		DOGE-PERP			0.0000000000000000
		DROGN-PERP		0.0000000000000000		DROGN-PERP			0.0000000000000000
		EGS-PERP		0.0000000000000000		EGS-PERP			0.0000000000000000
		ETH		0.000000017701040		ETH			0.000000017701040
		ETH-20210326		0.0000000000000007		ETH-20210326			0.0000000000000007
		ETH-20210625		-0.0000000000000017		ETH-20210625			-0.0000000000000017
		ETH-20211231		-0.0000000000000001		ETH-20211231			-0.0000000000000001
		ETHHALF		0.0000000000000000		ETHHALF			0.0000000000000000
		ETH-PERP		0.0000000000000074		ETH-PERP			0.0000000000000074
		EXCH-PERP		0.0000000000000000		EXCH-PERP			0.0000000000000000
		FIDA		5.5303890400000000		FIDA			5.5303890400000000
		FIDA_LOCKED		31.5314719500000000		FIDA_LOCKED			31.5314719500000000
		FIDA-PERP		0.0000000000000000		FIDA-PERP			0.0000000000000000
		FIL-PERP		0.0000000000000000		FIL-PERP			0.0000000000000000
		FTM		0.000000006776213		FTM			0.000000006776213
		FTT		0.000000009611207		FTT			0.000000009611207
		IOTA-PERP		0.0000000000000000		IOTA-PERP			0.0000000000000000
		KSM-PERP		0.0000000000000000		KSM-PERP			0.0000000000000000
		LEO		0.000000000236430		LEO			0.000000000236430
		LINK-20210326		0.0000000000000000		LINK-20210326			0.0000000000000000
		LINK-20210625		0.0000000000000000		LINK-20210625			0.0000000000000000
		LINKBULL		0.0000000000000000		LINKBULL			0.0000000000000000
		LINK-PERP		0.0000000000000000		LINK-PERP			0.0000000000000000
		LTC-20210326		0.0000000000000000		LTC-20210326			0.0000000000000000
		LTC-20210625		0.0000000000000000		LTC-20210625			0.0000000000000000
		LTC-PERP		0.0000000000000000		LTC-PERP			0.0000000000000000
		LUNC-PERP		0.0000000000000000		LUNC-PERP			0.0000000000000000
		MKR-PERP		0.0000000000000000		MKR-PERP			0.0000000000000000
		MTA-PERP		0.0000000000000000		MTA-PERP			0.0000000000000000
		NEO-PERP		0.0000000000000000		NEO-PERP			0.0000000000000000
		OMG-20210326		0.0000000000000000		OMG-20210326			0.0000000000000000
		OMG-PERP		0.0000000000000000		OMG-PERP			0.0000000000000000
		ONE-PERP		0.0000000000000000		ONE-PERP			0.0000000000000000
		REN		0.000000000351930		REN			0.000000000351930
		REN-PERP		0.0000000000000000		REN-PERP			0.0000000000000000
		RUNE-PERP		0.0000000000000000		RUNE-PERP			0.0000000000000000
		SECO-PERP		0.0000000000000000		SECO-PERP			0.0000000000000000
		SHB-PERP		0.0000000000000000		SHB-PERP			0.0000000000000000
		SHV-20211225		0.0000000000000000		SHV-20211225			0.0000000000000000
		SNX-PERP		0.0000000000000113		SNX-PERP			0.0000000000000113
		SOL		0.0000000005487166		SOL			0.0000000005487166
		SOL-PERP		0.0000000000000000		SOL-PERP			0.0000000000000000
		SUSHI-20210326		0.0000000000000000		SUSHI-20210326			0.0000000000000000
		SUSHI-20210625		0.0000000000000000		SUSHI-20210625			0.0000000000000000
		SUSHI-PERP		0.0000000000000000		SUSHI-PERP			0.0000000000000000
		THETA-20210326		0.0000000000000000		THETA-20210326			0.0000000000000000
		THETA-PERP		0.0000000000000000		THETA-PERP			0.0000000000000000
		TOMAD-PERP		0.0000000000000000		TOMAD-PERP			0.0000000000000000
		TRUMPFE8		0.00000000000003637		TRUMPFE8			0.00000000000003637
		TRX-PERP		0.0000000000000000		TRX-PERP			0.0000000000000000
		UNI-20210326		0.0000000000000000		UNI-20210326			0.0000000000000000
		UNI-PERP		0.0000000000000000		UNI-PERP			0.0000000000000000
		UNISWAP-20210326		0.0000000000000000		UNISWAP-20210326			0.0000000000000000
		UNISWAP-20210625		0.0000000000000000		UNISWAP-20210625			0.0000000000000000
		UNISWAP-PERP		0.0000000000000000		UNISWAP-PERP			0.0000000000000000
		USD		7.773791259691934500		USD			7.773791259691934500
		USDT		0.0000000104655506		USDT			0.0000000104655506
		USTC		0.00000000985452		USTC			0.00000000985452
		WAVES-20210326		0.0000000000000000		WAVES-20210326			0.0000000000000000
		WBTC		0.0000000007497684		WBTC			0.0000000007497684
		XLM-PERP		0.0000000000000000		XLM-PERP			0.0000000000000000
		XPB-PERP		0.0000000000000000		XPB-PERP			0.0000000000000000
		YFI		0.0000000007144680		YFI			0.0000000007144680
		YFI-20210326		0.0000000000000000		YFI-20210326			0.0000000000000000
		YFI-PERP		0.0000000000000000		YFI-PERP			0.0000000000000000
		ZEC-PERP		-0.0000000000000170		ZEC-PERP			-0.0000000000000170
		ZRX-PERP		0.0000000000000000		ZRX-PERP			0.0000000000000000
32828	Name on file	FTX Trading Ltd.		1,660.0100000000000000	56825*	Name on file	FTX Trading Ltd.		1,660.0100000000000000
10140	Name on file	West Realm Shires Services Inc.		1.0000000000000000	84808	Name on file	West Realm Shires Services Inc.		1.0000000000000000
		BAT		0.6133062400000000		BAT			0.6133062400000000
		BTC		4.2591853000000000		BTC			4.2591853000000000
		ETHW		0.5928687730000000		ETHW			0.5928687730000000
		GRT		1.0000000000000000		GRT			1.0000000000000000
		LINK		219.39869520000000		LINK			219.39869520000000
		MATIC		9,009.45387148000000		MATIC			9,009.45387148000000
		SHB		6,621,522.57180208000000		SHB			6,621,522.57180208000000
		SOL		72.2116745400000000		SOL			72.2116745400000000
		USD		0.008411577060679		USD			0.008411577060679
34715	Name on file	Quoine Pte Ltd	XDC	33,060.73152347000000	92481	Name on file	Quoine Pte Ltd	USD	0.0038380000000000
								USDT	0.0003100000000000
								XDC	33,060.73152347000000
19447	Name on file	FTX Trading Ltd.	AVAX	0.8797613130000000	32643*	Name on file	FTX Trading Ltd.	AVAX	0.8797613130000000
			BTC	0.0411962300000000				BTC	0.0411962300000000
			ETH	0.6150260800000000				ETH	0.6150260800000000
			ETHW	0.6147677000000000				ETHW	0.6147677000000000
			USD	100.3100000000000000				USD	100.3100000000000000
16508	Name on file	Quoine Pte Ltd		Undetermined*	58857	Name on file	Quoine Pte Ltd	BTC	0.7340659900000000
								ETH	0.1613000000000000
								ETHW	0.1613000000000000
								SGD	7,502.9355000000000000
								USD	1.8123100000000000
25529	Name on file	Quoine Pte Ltd	SGD	7,502.00000000000000	58857	Name on file	Quoine Pte Ltd	BTC	0.7340659900000000
			USD	12,347.00000000000000				ETH	0.1613000000000000
								ETHW	0.1613000000000000
								SGD	7,502.93550000000000
								USD	1.8123100000000000
42847									